

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CHERI THOMPSON	)	CIVIL ACTION NO.
Plaintiff,	)	
	)	
v.	)	COMPLAINT
	)	
NORWEGIAN CRUISE LINE as	)	
Owners of the M/S NORWEGIAN DAWN	)	
Defendant	)	

**INTRODUCTION**

1. This is an action for maritime personal injuries which occurred on or about August 15, 2015, while the Plaintiff, Cheri Thompson, was a passenger aboard the M/S NORWEGIAN DAWN, which was owned, operated, chartered, and/or controlled by the Defendant, Norwegian Cruise Line. The Plaintiff asserts a cause of action against each Defendant for personal injuries based upon negligence brought under the General Maritime Law.

**JURISDICTION**

2. This is a case of maritime jurisdiction pursuant to 28 U.S.C. § 1333(1).

**THE PARTIES**

3. The Plaintiff, Cheri Thompson, is an individual of legal age and resides at 163 Farm Street, Blackstone, Massachusetts.
4. The Defendant, Norwegian Cruise Line, is a corporation organized under the laws of Florida with a principal office at 7665 Corporate Center Drive, Miami, FL, and at all times hereinafter referred to, owned, operated and/or controlled the M/S NORWEGIAN DAWN.

5. Norwegian Cruise Line did business in The Commonwealth of Massachusetts. The M/S NORWEGIAN DAWN uses Boston, Massachusetts as a hailing port to discharge and pick up cruise passengers. The cruise which gives rise to this Complaint originated and ended in Boston, Massachusetts.

### **FACTUAL ALLEGATIONS**

6. On or about August 15, 2015 the Plaintiff was a lawful passenger aboard the M/S NORWEGIAN DAWN, which was operating in navigable waters for purposes of a cruise. While aboard the vessel the Plaintiff sustained serious personal injuries when she slipped on ice and liquid on the dance floor. The Plaintiff sustained a fractured ankle.

### **COUNT I**

#### **GENERAL MARITIME LAW- NEGLIGENCE** (Cheri Thompson v. Norwegian Cruise Line)

7. Paragraphs 1-6 are realleged and incorporated herein.
8. The injuries sustained by the Plaintiff were no fault of his own, but were caused by the negligence of the Defendant.
9. As a result of the said injuries, the Plaintiff has suffered great pain of body and anguish of mind, incurred medical and hospital expenses, and has suffered and will suffer other damages as will be shown at the trial.
10. This cause of action is brought for negligence under the General Maritime Law.

### **REQUEST FOR RELIEF**

1. Under Count I, that this court enter judgment in favor of the Plaintiff against the Defendant.
2. For such other relief as this court deems appropriate.

**PLAINTIFF DEMANDS TRIAL BY JURY**

Respectfully submitted,  
By her attorney,

/s/ Thomas M. Bond  
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I *certify* that a true copy of the above document  
was served upon each attorney of record by ECF  
on

/s/ Thomas M. Bond